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Via ECF

Honorable Douglas E. Arpert, U.S.M.J.
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608

**RE: *Lawson, et al v. Praxair, et al*
Civil Action No. 3:16-cv-02435**

Dear Judge Arpert:

This firm is counsel to the Plaintiffs in the above captioned matter. This letter is submitted in supplement to Plaintiffs' filing of April 30, 2019 (ECF 193). That filing set forth Plaintiffs' position on issues regarding the appointment of a Special Master. However, in review of that filing, one issue was inadvertently left out.

In addition to the matters previously set forth, the Plaintiffs respectfully request that the parties be permitted to file unilateral, as opposed to joint, written discovery applications to the Special Master. One of the purposes of Plaintiffs' request for a Special Master is to expedite this litigation through a more streamlined approach to discovery disputes. Thus far in this case, the filing of joint applications has caused delays in the process of bringing discovery issues to the Court's attention.

Respectfully submitted,

Sheridan & Murray, LLC

/s/ Christopher D. Hinderliter
CHRISTOPHER D. HINDERLITER

cc: **Via ECF**
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